
From: Mary Scurlock
To: jeffrey.lockwood@noaa.gov; Kim Kratz; Kubo, Teresa; FOSTER Eugene P; Rob Walton
Sent: 3/23/2015 7:12:27 PM
Subject: Committee for Family Forestlands Letter
Attachments: ATT00001.htm; CFF letter - attachment to April 22 15 BOF Materials.doc

Dear federal agency staff contacts on Oregon Forest Practices:

Please find attached the letter from the Committee for Family Forestlands that is being delivered to the Board as part of the official Board Materials for the April 22 meeting. The upshot is that they do not see a need for any rule changes by ODF. For example:

- “The outcomes from [all the Oregon plan and landowner efforts] have been positive, confirmed by trends in fish populations. For example, the attached graph from the Oregon Forest Resources Institute uses Oregon Department of Fish & Wildlife data to display population trends for Coho Salmon in coastal watersheds from 1950 to 2014. This graph clearly shows the positive outcomes from private landowner and public efforts.”
- "2. The current Oregon Forest Practices Act and the Oregon Plan, which is based on volunteer efforts, are working well as evidenced by both the findings in the paired watershed studies and fish population trends.”

I think you will agree that these claims are unsubstantiated. It is troubling that four years after this rule process formally began the landowning community has moved so little on this issue, even in light of the recent CZARA disapproval decision and its rationale. There are many possible explanations for this - including the state's culture of over-representing the capabilities of voluntary measures to address industrial forestry impacts. But my purpose in sending this message is to urge your federal oversight agencies to do what you can to reiterate that: 1) there is no reasonable doubt about the need for change to stop real harm now being allowed to fish and other critters; 2) a few good coho return years is not dispositive evidence that all is well in forest practices land, and; 3) that the paired watershed study findings are consistent with RipStream and cannot — as a matter to statistics and for other reasons — be used to conclude that there is no adverse biological impact on fish under current rules.

I urge your agencies to find appropriate ways to be involved in the public discourse around these and other issues as we reached the conclusion of this ODF rule process.

Regards,

Mary